

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

DOUGLAS WEAKLEY,

Plaintiff,

v.

**HOMELAND SECURITY SOLUTIONS,
INC.,**

Defendant.

Case No. 3:14-cv-00785

DEFENDANT HSSI'S MOTION TO DISMISS

NOW COMES Defendant, Homeland Security Solutions, Inc. (hereinafter, "HSSI"), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and moves this Court for entry of an Order dismissing the Complaint filed by Plaintiff Douglas Weakley against HSSI in the above-captioned matter, for the reasons set forth in HSSI's accompanying Memorandum in Support filed contemporaneously herewith.

HOMELAND SECURITY SOLUTIONS,
INC.

By: /s/ Christopher A. Abel

Christopher A. Abel (VSB No. 31821)
D. Sutton Hirschler III (VSB No. 85596)
Counsel for Defendant Homeland
Security Solutions, Inc.
Willcox & Savage, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510
Telephone: 757.628.5547
Facsimile: 757.333.3547
cabel@wilsav.com
dhirschler@wilsav.com

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. There are no parties who will receive notification of such filing (NEF) electronically, however a copy is being served on the following *via* First Class Mail, postage prepaid:

Douglas Weakley, *pro se*
8350 Wetherden Drive
Mechanicsville, Virginia 23111

To the best of my knowledge there are no other parties who require service by other means.

By /s/ Christopher A. Abel
Christopher A. Abel (VSB No. 31821)
Counsel for Defendant Homeland
Security Solutions, Inc.
Willcox & Savage, P.C.
440 Monticello Avenue, Suite 2200
Norfolk, Virginia 23510
Telephone: 757.628.5547
Facsimile: 757.333.3547
cabel@wilsav.com

NOTICE TO PARTIES WHO DO NOT HAVE COUNSEL IN THIS ACTION

As required by Local Rule 7(K), the following warning is given to all parties who do not have counsel representing them in this action (referred to as a “*pro se* party”). Specifically, this notice is given to Douglas Weakley.

(1) The *pro se* party is entitled to file a response opposing the motion and that any such response must be filed within twenty-one (21) days of the date on which the dispositive or partially dispositive motion is filed; and

(2) The Court could dismiss the action on the basis of the moving party’s papers if the *pro se* party does not file a response; and

(3) The *pro se* party must identify all facts stated by the moving party with which the *pro se* party disagrees and must set forth the *pro se* party’s version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and

(4) The *pro se* party is also entitled to file a legal brief in opposition to the one filed by the moving party.

BE GOVERNED ACCORDINGLY.